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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

MAY 0 3 2011

Mr. Steven C. Nasan
Director, Residential Real Estate
Harvard Real Estate Services
Holyoke Center
1350 Massachusetts Avenue
Cambridge, Massachusetts 02138

Re: Modification to Risk-Based PCB Cleanup and Disposal Approval under 40 CFR § 761.61(c) and § 761.79(h)
Peabody Terrace Housing Complex, Cambridge, Massachusetts
Mass DEP RTN: 3-28873

Dear Mr. Nason:

This is in response to the February 16, 2011 President and Fellows of Harvard College (Harvard) request to modify its PCB remediation plan to include the Peabody Terrace Housing Complex Buildings E, F, and Y located at 900 Memorial Drive, Cambridge, Massachusetts (the Site). These buildings contain caulk that exceeds the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20 and § 761.62. PCBs concentrations have also been identified in building concrete which exceed the allowable PCB levels for unrestricted use under 40 CFR § 761.61(a).

Harvard submitted the modification request in accordance with Condition 17 of the April 15, 2010 Risk-Based PCB Cleanup and Disposal Approval under 40 CFR § 761.61(c) and § 761.79(h) (Approval). As required under Condition 21 of the Approval, Harvard submitted a *February 2011 Peabody Terrace Façade Project – PCB Remediation Status Report Buildings A, B, C, X* (Remediation Status Report) detailing the PCB remedial activities that were conducted on Buildings A, B, C, and X to support the modification request. Harvard provided additional information on its proposed plan on April 18, 2011 in response to EPA's comments on the modification request.

In general, Harvard is proposing to conduct PCB remediation work in accordance with the procedures that were used on Buildings A, B, C, and X and which were identified in the Notification and in subsequent modification requests 1 through 3, with the following exceptions:

- Interior caulk located within the Building E Common Area does not contain PCBs at greater than (>) 1 part per million (ppm) and will not be removed;

- Horizontal balcony joints, patio joints, and doorstep joints (all in former direct contact with PCB caulk) will be encapsulated with three (3) coats of an epoxy coating and new caulk;

- Exterior concrete surfaces not in former direct contact with PCB caulk, including exterior walls and balcony/patio vertical surfaces, and concrete patios will be encapsulated with two (2) coats of an acrylic coating and/or liquid balcony coating system;

- PCB caulk located along two (2) concrete to concrete joints and the associated PCB-contaminated concrete with > 1 ppm located in the Building F child care center will be removed; or alternatively, if the PCB cleanup level in the concrete cannot be achieved even after multiple removals, the concrete will be encapsulated;

- Verification sampling frequency on decontaminated *non-porous surfaces* (i.e. metal window and door frames) will be one (1) sample per every twenty (20) decontaminated frames, with exception of the Building F child care center where the proposed sampling frequency is one (1) sample per every fifty (50) linear feet of decontaminated *non-porous surfaces*;

- Verification sampling frequency on encapsulated concrete balconies will be one (1) sample per every ten (10) encapsulated concrete balconies;

- A minimum of three (3) verification samples shall be collected from the nine (9) sets of encapsulated door steps;

- A minimum of three (3) verification samples shall be collected from the eight (8) encapsulated patio surfaces; and,

- Air monitoring will be conducted during task specific work, such as during concrete removal, rather than hourly.

Based on the EPA's review of the Remediation Status Report, it appears that the removal/encapsulation work is effective in mitigating the caulk and PCB-contaminated building surfaces. Thus, EPA is approving your modification request with the following conditions:

1. Unless otherwise modified by this letter, Harvard must comply with all terms and conditions specified in its Approval;

2. This modification approval only addresses Buildings E, F, and Y. Following submittal of the report required under Condition 21 of the Approval, Harvard may request a modification to incorporate cleanup of the remaining buildings at the Site under the Approval;

3. The decontamination standard for *non-porous surfaces* (i.e. metal window and door frames) located in the Building F child care center shall be less than or equal to (≤) 1 µg/100 cm^2 PCBs and the verification sampling frequency shall be one (1) sample per every twenty-five (25) linear feet of decontaminated *non-porous surfaces*;

4. The verification sampling frequency for the decontaminated concrete to concrete joints located in the Building F child care center shall be a minimum of two (2) samples per joint;

5. Harvard shall submit the results of its soil investigation and its proposed plan to clean up PCB-contaminated soils with greater than (>) 1 ppm PCBs located around Buildings E, F, and Y for EPA review and approval;

6. Harvard must obtain all necessary State and local permits or approvals required for these modifications; and,

7. The modifications approved by this letter shall be included in the final completion report and the notation on the deed as required under Conditions 21 and 22 of the Approval, respectively.

Under the Approval and this modification approval, EPA is reserving its right to require additional investigation or mitigation measures should the results of the abatement work that has been conducted or that will be conducted indicate that an unreasonable risk to building occupants and/or building users is present at the Site.

Should you have any questions regarding this matter, please contact Kimberly Tisa at (617) 918-1527.

Sincerely,

James T. Owens III, Director
Office of Site Remediation & Restoration

cc: J. Hamel, Woodard & Curran
Mass DEP RTN: 3-28873
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